



Maryland

Department of the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary
Adam Ortiz, Deputy Secretary

Mr. Andrew J. Black, VP Engineering
H&S Bakery, Inc.
603 South Bond Street
Baltimore, MD 21231

SEP 17 2025

Re: Renewal Part 70/Title V Operating Permit #24-510-0301

Enclosed, please find the Renewal Part 70/Title V Operating Permit and Fact Sheet for the H&S Bakery facility located in Baltimore City, MD. The Permit will expire on May 31, 2030.

The Code of Maryland Regulations (COMAR) 26.11.03.11 states the following:

If the Department denies a Part 70 permit or issues it with terms and conditions that are objectionable to the applicant, the applicant may request that a contested case hearing be held regarding the permit. This request shall be made to the Department in writing not later than 15 days after the applicant receives notice that the permit has been denied or of the objectionable terms and conditions. The request shall include the basis for the request and refer to any objectionable terms and conditions.

Please note the following revised condition in the Permit under Section II, General Conditions, Number 5, Permit Renewal:

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit 12 months before the expiration of the permit. Upon submitting a complete application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

If you have any questions, please feel free to contact Ms. Sarah Wells, at sarah.wells@maryland.gov or (410) 537-3254.

Sincerely,

Suna Yi Sariscak, Manager
Air Quality Permits Program
Air & Radiation Administration

SYS/jm

Enclosures

cc: EPA Region III (w/encl)

Wes Moore
Governor*State of*Serena McIlwain
Secretary*Maryland***DEPARTMENT OF THE ENVIRONMENT**Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230☐ Construction PermitPart 70
☒ Operating Permit

PERMIT NO. 24-510-0301

DATE ISSUED

SEP 17 2025

PERMIT FEE To be paid in accordance with
COMAR 26.11.02.19BEXPIRATION
DATE

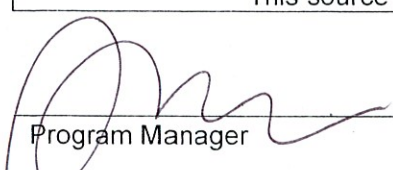
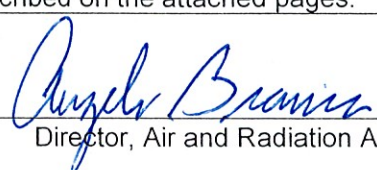
May 31, 2030

LEGAL OWNER & ADDRESSH & S Bakery, Inc.
603 S. Bond Street
Baltimore, MD 21231
Attn: Mr. Andrew J. Black, VP of Engineering**SITE**H & S Bakery, Inc.
603 S. Bond Street
Baltimore, MD 21231
AI #11411**SOURCE DESCRIPTION**

One (1) commercial bakery facility consisting of two (2) boilers and four (4) bakery ovens.

This source is subject to the conditions described on the attached pages.

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Program Manager
Director, Air and Radiation Administration

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SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

H & S Bakery, Inc. is located at 603 South Bond Street, Baltimore, MD 21231, and is a commercial bakery that produces several varieties of loaf breads and rolls. The facility operates four (4) baking lines, each of which uses a straight dough process. The primary SIC code for the facility is 2051.

The straight dough process does not require an initial fermentation period. All ingredients are mixed and immediately charged to a hopper that extrudes the dough in a continuous uniform stream. The dough passes through several machines to be shaped and cut down before being conveyed through a proof box where the dough rises. The dough is then transferred to an oven for baking, and the finished bread loafs and rolls and transported to a packaging plant via enclosed conveyors.

The Proof Box requires a high humidity environment to effectively process the dough. The facility's boilers produce the process steam for the Proof Box. Only one boiler is operated at a time while the second boiler serves as a backup. All boilers and bakery ovens are fired with natural gas only. Based on annual actual production the facility's largest oven is currently oven number 1.

The Permittee also operates a machine shop that has two (2) small Safety-Kleen® degreasers that are not subject to permit-to-construct requirements.

2. FACILITY INVENTORY LIST

Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
BLR-1	5-2213	Cleaver Brooks boiler, rated at 12.5 MMBtu/hr, fired by natural gas only	2016 (replaced original no. 1 boiler installed before 1976)
BLR-2	5-2148	Cleaver Brooks Steam (CBR-700-300-1-1) boiler rated at 12.55 MMBtu/hr, fired by natural gas only	2013 (replaced original no. 2 boiler installed before 1989)

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BO-1	8-0278	Baking Oven No. 1, Turkington 970-48, rated at 6.0 MMBtu/hr, fired by natural gas only	2008 (replaced original no. 1 oven installed in 1950)
BO-2		Baking Oven No. 2, Werner & Pfleiderer Ecotherm tunnel oven for rolls, rated at 2.5 MMBtu/hr, fired by natural gas only	2003 (replaced original no. 2 oven installed in 1950)
BO-3		Baking Oven No. 3, Baker Thermal Solutions model 960 tunnel oven for buns and rolls, rated at 3.0 MMBtu/hr, fired by natural gas only	2015 (replaced original no. 3 oven installed in 1950)
BO-5		Baking Oven No. 5, APV Baker model 970-68 tray oven for bread production, rated at 8.5 MMBtu/hr, fired by natural gas only	2004 (replaced original no. 5 oven installed in 1950)

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SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

2. ACRONYMS

ARA	Air and Radiation Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide

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TAP	Toxic Air Pollutant
tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

The effective date of the conditions in this Part 70 permit is the date of permit issuance, unless otherwise stated in the permit.

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

Upon expiration of this permit, the terms of the permit will automatically continue to remain in effect until a new Part 70 permit is issued for this facility provided that the Permittee has submitted a timely and complete application and has paid applicable fees under COMAR 26.11.02.16.

Otherwise, upon expiration of this permit the right of the Permittee to operate this facility is terminated.

5. PERMIT RENEWAL

[COMAR 26.11.03.02B(3)] and [COMAR 26.11.03.02E]

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit at least 12 months before the expiration of the permit. Upon submitting a completed application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

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6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

In accordance with the provisions of the State Government Article, Sec. 10-611 et seq., Annotated Code of Maryland, all information submitted in an application shall be considered part of the public record and available for inspection and copying, unless the Permittee claims that the information is confidential when it is submitted to the Department. At the time of the request for inspection or copying, the Department will make a determination with regard to the confidentiality of the information. The Permittee, when requesting confidentiality, shall identify the information in a manner specified by the Department and, when requested by the Department, promptly provide specific reasons supporting the claim of confidentiality. Information submitted to the Department without a request that the information be deemed confidential may be made available to the public. Subject to approval of the Department, the Permittee may provide a summary of confidential information that is suitable for public review. The content of this Part 70 permit is not subject to confidential treatment.

7. PERMIT ACTIONS

[COMAR 26.11.03.06E(3)] and [COMAR 26.11.03.20(A)]

This Part 70 permit may be revoked or reopened and revised for cause. The filing of an application by the Permittee for a permit revision or renewal; or a notification of termination, planned changes or anticipated noncompliance by the facility, does not stay a term or condition of this permit.

The Department shall reopen and revise, or revoke the Permittee's Part 70 permit under the following circumstances:

- a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;
- b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;
- c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or

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- d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

The Permittee shall maintain this Part 70 permit in the vicinity of the facility for which it was issued, unless it is not practical to do so, and make this permit immediately available to officials of the Department upon request.

9. REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA

[COMAR 26.11.03.20B]

The EPA may terminate, modify, or revoke and reissue a permit for cause as prescribed in 40 CFR §70.7(g)

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

The Permittee shall not transfer this Part 70 permit except as provided in COMAR 26.11.03.15.

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

[COMAR 26.11.03.14] and [COMAR 26.11.03.06A(8)]

- a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.
- b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

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- c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.
- d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

The Permittee may apply to the Department to make a significant modification to its Part 70 Permit as provided in COMAR 26.11.03.17 and in accordance with the following conditions:

- a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.
- b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.
- c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal, including the requirements for applications, public participation, and review by affected states and EPA, except:
 - (1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any new applicable requirements of the Clean Air Act that will apply if the change occurs;

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- (2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable terms and conditions of the Part 70 permit that are affected by the significant permit modification.
- d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).
- e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.
- f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.
- g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

The Permittee may apply to the Department to make a minor modification to the federally enforceable provisions of this Part 70 permit as provided in COMAR 26.11.03.16 and in accordance with the following conditions:

- a. A minor permit modification is a Part 70 permit revision that:
 - (1) Does not result in a violation of any applicable requirement of the Clean Air Act;
 - (2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:
 - (a) Adding new requirements,

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- (b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or
 - (c) Changing from one approved test method for a pollutant and source category to another;
 - (3) Does not require or modify a:
 - (a) Case-by-case determination of a federally enforceable emissions standard,
 - (b) Source specific determination for temporary sources of ambient impacts, or
 - (c) Visibility or increment analysis;
 - (4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:
 - (a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and
 - (b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act
 - (5) Is not a Title I modification; and
 - (6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.
- b. Application for a Minor Permit Modification

The Permittee shall submit to the Department an application for a minor permit modification that satisfies the requirements of COMAR 26.11.03.03 which includes the following:

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- (1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;
- (2) The proposed minor permit modification;
- (3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:
 - (a) The proposed change meets the criteria for a minor permit modification, and
 - (b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;
- (4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

- (1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.
- (2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):
 - (a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.
 - (b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

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- d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.
- e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

The Permittee may apply to the department to make an administrative permit amendment as provided in COMAR 26.11.03.15 and in accordance with the following conditions:

- a. An application for an administrative permit amendment shall:
 - (1) Be in writing;
 - (2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and
 - (3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.
- b. An administrative permit amendment:
 - (1) Is a correction of a typographical error;
 - (2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;
 - (3) requires more frequent monitoring or reporting by the Permittee;

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- (4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);
 - (5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);
 - (6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);
 - (7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or
 - (8) Incorporates any change to a term or condition specified as State-only enforceable, if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.
- c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application, if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.
 - d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15 , but only after the Department takes final action to revise the permit.
 - e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

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15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

The Permittee may make off-permit changes to this facility as provided in COMAR 26.11.03.19 and in accordance with the following conditions:

- a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:
 - (1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;
 - (2) The change is not subject to any requirements under Title IV of the Clean Air Act;
 - (3) The change is not a Title I modification; and
 - (4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.
- b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.
- c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.
- d. The Permittee shall keep a record describing:
 - (1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act , but not otherwise regulated under this permit; and
 - (2) The emissions resulting from those changes.

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- e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.
- f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.
- g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.
- h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

The Permittee may make on-permit changes that are allowed under Section 502(b)(10) of the Clean Air Act as provided in COMAR 26.11.03.18 and in accordance with the following conditions:

- a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:
 - (1) The change is not a Title I modification;
 - (2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;
 - (3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;
 - (4) The change does not violate an applicable requirement of the Clean Air Act;
 - (5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

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- (6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;
 - (7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and
 - (8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.
- b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:
 - (1) A description of the proposed change;
 - (2) The date on which the change is proposed to be made;
 - (3) Any change in emissions resulting from the change, including the pollutants emitted;
 - (4) Any new applicable requirement of the Clean Air Act; and
 - (5) Any permit term or condition that would no longer apply.
- c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.
- d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.
- e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.
- f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.

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- g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.
- h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

17. FEE PAYMENT

[COMAR 26.11.02.16A(2) & (5)(b)]

- a. The fee for this Part 70 permit is as prescribed in Regulation .19 of COMAR 26.11.02.
- b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.
- c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

The Permittee may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits-to-construct and approvals:

- a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;
- b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;
- c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

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- d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;
- e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;
- f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;
- g. In the event of a conflict between the applicability of (a.— e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.
- h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required by (c.— g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

The Permittee may request the Department to authorize special procedures for the Permittee to apply simultaneously, to the extent possible, for a permit to construct and a revision to this permit.

These procedures may provide for combined public notices, informational meetings, and public hearings for both permits but shall not adversely affect the rights of a person, including EPA and affected states, to obtain information about the application for a permit, to comment on an application, or to challenge a permit that is issued.

These procedures shall not alter any existing permit procedures or time frames.

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20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

This Part 70 permit does not convey any property rights of any sort, or any exclusive privileges.

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

If any portion of this Part 70 permit is challenged, or any term or condition deemed unenforceable, the remainder of the requirements of the permit continues to be valid.

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

The Permittee shall allow employees and authorized representatives of the Department, the EPA, and local environmental health agencies, upon presentation of credentials or other documents as may be required by law, to:

- a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;
- b. Have access to and make copies of records required by the permit;
- c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and
- d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

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23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

The Permittee shall furnish to the Department, within a reasonable time specified by the Department, information requested in writing by the Department in order to determine whether the Permittee is in compliance with the federally enforceable conditions of this Part 70 permit, or whether cause exists for revising or revoking the permit. Upon request, the Permittee shall also furnish to the Department records required to be kept under the permit.

For information claimed by the Permittee to be confidential and therefore potentially not discloseable to the public, the Department may require the Permittee to provide a copy of the records directly to the EPA along with a claim of confidentiality.

The Permittee shall also furnish to the Department, within a reasonable time specified by the Department, information or records requested in writing by the Department in order to determine if the Permittee is in compliance with the State-only enforceable conditions of this permit.

24. COMPLIANCE REQUIREMENTS

**[COMAR 26.11.03.06E(1)] and [COMAR 26.11.03.06A(11)] and
[COMAR 26.11.02.05]**

The Permittee shall comply with the conditions of this Part 70 permit. Noncompliance with the permit constitutes a violation of the Clean Air Act, and/or the Environment Article Title 2 of the Annotated Code of Maryland and may subject the Permittee to:

- a. Enforcement action,
- b. Permit revocation or revision,
- c. Denial of the renewal of a Part 70 permit, or
- d. Any combination of these actions.

The conditions in this Part 70 permit are enforceable by EPA and citizens under the Clean Air Act except for the State-only enforceable conditions.

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Under Environment Article Section 2-609, Annotated Code of Maryland, the Department may seek immediate injunctive relief against a person who violates this permit in such a manner as to cause a threat to human health or the environment.

25. CREDIBLE EVIDENCE

Nothing in this permit shall be interpreted to preclude the use of credible evidence to demonstrate noncompliance with any term of this permit.

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

The need to halt or reduce activity in order to comply with the conditions of this permit may not be used as a defense in an enforcement action.

27. CIRCUMVENTION

[COMAR 26.11.01.06]

The Permittee may not install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total weight of emissions, conceals or dilutes emissions which would otherwise constitute a violation of any applicable air pollution control regulation.

28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

- a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;

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- b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;
- c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;
- d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or
- e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

For all alternate operating scenarios approved by the Department and contained within this permit, the Permittee, while changing from one approved scenario to another, shall contemporaneously record in a log maintained at the facility each scenario under which the emissions unit is operating and the date and time the scenario started and ended.

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SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

2. OPEN BURNING

[COMAR 26.11.07]

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to any open burning, the Permittee shall request and receive approval from the Department.

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

[COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]

The Permittee shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of this permit, including those in Section VI – State-only Enforceable Conditions:

- a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

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- b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;
- c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;
- d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.
- e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

5. ACCIDENTAL RELEASE PROVISIONS

[COMAR 26.11.03.03B(23)] and [40 CFR 68]

Should the Permittee become subject to 40 CFR 68 during the term of this permit, the Permittee shall submit risk management plans by the date specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

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The Permittee shall initiate a permit revision or reopening according to the procedures of 40 CFR 70.7 to incorporate appropriate permit conditions into the Permittee's Part 70 permit.

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with this Part 70 permit. The Department, at its option, may witness or conduct these tests. This testing shall be done at a reasonable time, and all information gathered during a testing operation shall be provided to the Department.

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

Compliance with the emissions standards and limitations in this Part 70 permit shall be determined by the test methods designated and described below or other test methods submitted to and approved by the Department.

Reference documents of the test methods approved by the Department include the following:

- a. 40 CFR 60, appendix A
- b. 40 CFR 51, appendix M
- c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

8. EMISSIONS CERTIFICATION REPORT

**[COMAR 26.11.01.05-1] and [COMAR 26.11.02.19C] and
[COMAR 26.11.02.19D]**

The Permittee shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis.

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- a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;
- b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:
 - (1) Familiar with each source for which the certifications forms are submitted, and
 - (2) Responsible for the accuracy of the emissions information;
- c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:
 - (1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;
 - (2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
 - (3) Amounts, types and analyses of all fuels used;
 - (4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;
 - (5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:
 - (a) Significant maintenance performed,
 - (b) Malfunctions and downtime, and
 - (c) Episodes of reduced efficiency of all equipment;
 - (6) Limitations on source operation or any work practice standards that significantly affect emissions; and
 - (7) Other relevant information as required by the Department.

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9. COMPLIANCE CERTIFICATION REPORT

[COMAR 26.11.03.06G(6) and (7)]

The Permittee shall submit to the Department and EPA Region III a report certifying compliance with each term of this Part 70 permit including each applicable standard, emissions limitation, and work practice for the previous calendar year by April 1 of each year.

- a. The compliance certification shall include:
 - (1) The identification of each term or condition of this permit which is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether the compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of each source, currently and over the reporting period; and
 - (5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.
- b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

The certification shall be in the following form:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate

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the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

The Permittee shall gather and retain the following information when sampling and testing for compliance demonstrations:

- a. The location as specified in this permit, and the date and time that samples and measurements are taken;
- b. All pertinent operating conditions existing at the time that samples and measurements are taken;
- c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;
- d. The identity of the Permittee, individual, or other entity that performed the analysis;
- e. The analytical techniques and methods used; and
- f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and information that support the compliance certification for a period of five (5) years from the date that the monitoring, sample measurement, application, report or emissions test was completed or submitted to the Department.

These records and support information shall include:

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- a. All calibration and maintenance records;
- b. All original data collected from continuous monitoring instrumentation;
- c. Records which support the annual emissions certification; and
- d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR 93, Subpart B and COMAR 26.11.26.09.

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

The Permittee shall comply with 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.
- b. Equipment used during the maintenance, service, repair or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

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- c. Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- d. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.155.
- e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

16. ACID RAIN PERMIT

Not applicable

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SECTION IV PLANT SPECIFIC CONDITIONS

This section provides tables that include the emissions standards, emissions limitations, and work practices applicable to each emissions unit located at this facility. The Permittee shall comply with all applicable emissions standards, emissions limitations and work practices included herein.

The tables also include testing, monitoring, record keeping and reporting requirements specific to each emissions unit. In addition to the requirements included here in **Section IV**, the Permittee is also subject to the general testing, monitoring, record keeping and reporting requirements included in **Section III – Plant Wide Conditions** of this permit.

Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, all records that the Permittee is required under this section to establish. [Authority: COMAR 26.11.03.06C(5)(g)]

Table IV – 1	
1.0	<u>Emissions Unit Number(s)</u> BLR – 1: One (1) Cleaver Brooks boiler, 12.5 MMBtu/hr maximum heat input, fired by natural gas only (ARA registration number 510-0301-5-2213; installed 2016) BLR – 2: One (1) Cleaver Brooks Steam (CBR-700-300-1-1) boiler rated at 12.55 MMBtu/hr, fired by natural gas only (ARA registration number 510-0301-5-2148; installed 2013)
1.1	<u>Applicable Standards/Limits:</u> A. <u>Visible Emissions Limitations</u> COMAR 26.11.09.05A(2) , which requires that a person not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers. Exceptions. COMAR 26.11.09.05A(3) establishes that Section A(2) does not apply “to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period.”

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Table IV – 1	
	B. <u>Operational Limitation</u> : The Permittee shall burn only natural gas in the boilers unless the Permittee obtains from the Department written authorization to burn alternative fuels. [Authority: COMAR 26.11.02.09A]
1.2	<u>Testing Requirements:</u> A. & B. See record keeping and reporting requirements.
1.3	<u>Monitoring Requirements:</u> A. & B. See record keeping and reporting requirements.
1.4	<u>Record Keeping Requirements:</u> A. & B. The Permittee shall keep for at least five (5) years a monthly record of fuel combusted or the amounts of each type of fuel delivered to the property each month. [Authority: 40 CFR §60.48c(g)(2) and (3)]
1.5	<u>Reporting Requirements:</u> A. & B. The Permittee shall report occurrences of visible emissions from the boilers in accordance with condition number 4 ("Report of Excess Emissions and Deviations"), and number 9 ("Compliance Certification Report") of <u>Section III – Plant Wide Conditions</u> .

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Table IV – 2	
2.0	<u>Emissions Unit Numbers:</u> BO-1, BO-2, BO-3, BO-5, Four (4) Commercial Bakery Ovens Fired by Natural Gas and that Produce Loaf Breads and Rolls (ARA Registration No. 510-0301-8-0278): BO – 1: Baking Oven No. 1, Turkington 970-48, 6.0 MMBtu/hr maximum heat input, installed in 2008 BO – 2: Baking Oven No. 2, Werner & Pfeiderer Ecotherm tunnel oven for rolls, 2.5 MMBtu/hr maximum heat input, installed in 2003 BO – 3: Baking Oven No. 3, Baker Thermal Solutions model 960 tunnel oven for buns and rolls, 3.0 MMBtu/hr maximum heat input, installed in 2015 BO – 5: Baking Oven No. 5, APV Baker model 970-68 tray oven for bread production, 8.5 MMBtu/hr maximum heat input, installed in 2004
2.1	<u>Applicable Standards/Limits:</u> A. <u>Visible Emissions Limitations</u> A1. COMAR 26.11.06.02C(2), which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers. Exceptions: COMAR 26.11.06.02A(2) establishes that “the visible emissions standards in COMAR 26.11.06.02C do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period.” A2. Operational Requirement: The Permittee shall burn only natural gas in each of the ovens unless the Permittee obtains from the Department written authorization to burn alternative fuels. [Authority: permit-to-construct 510-8-0278 issued 7/23/2015] B. <u>Control of Particulate</u> COMAR 26.11.06.03B(2)(a), which limits the concentration of particulate matter in process exhaust gases to not more than 0.03 grains per standard cubic foot of dry exhaust gas. C. <u>Control of VOC</u>

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Table IV – 2	
	C1. COMAR 26.11.19.21, which establishes requirements for control of VOC from commercial bakery ovens. C2. In accordance with COMAR 26.11.19.21C(5), for any commercial bakery oven constructed on or after January 1, 1994, that satisfies the conditions in COMAR 26.11.19.21D(1), the Permittee shall comply with COMAR 26.11.19.21D(2). C3. In accordance with COMAR 26.11.19.21C & D(1), if any of the facility's bakery ovens exceed the average annual production tonnage of finished bread, rolls, or other yeast-raised products for the corresponding Yt value listed below, then thereafter the Permittee shall be subject to COMAR 26.11.19.21D(2). (1) 10,000 tons with a Yt value of greater than 11.0; (2) 15,000 tons with a Yt value between 8.1 and 11.0; (3) 22,500 tons with a Yt value less than 5.0 and 8.0; (4) 28,000 tons with a Yt value less than 5.0. C4. In accordance with COMAR 26.11.19.21D(2), if an affected commercial bakery oven satisfies any of the conditions in COMAR 26.11.19.21D(1), the Permittee shall not cause or permit the discharge of VOC into the atmosphere unless emissions from the affected oven are exhausted directly into a control device which is installed, operated, and maintained to reduce VOC emissions from the bakery oven by 80 percent or more overall. In accordance with COMAR 26.11.19.21F(3), if an affected commercial bakery oven satisfies any of the conditions in COMAR 26.11.19.21D(1) the Permittee shall comply with the requirements of COMAR 26.11.19.21D(2) within one (1) calendar year after the year in which the conditions were satisfied.
2.2	<u>Testing Requirements:</u> A. & B. See record keeping and reporting requirements. C. See monitoring, record keeping, and reporting requirements.

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Table IV – 2	
2.3	<u>Monitoring Requirements:</u> A. & B. See record keeping and reporting requirements. C. For each month of operation and for all periods of twelve consecutive months the Permittee shall determine the production of yeast raised products and weighted average Yt values for the facility's largest commercial bakery oven installed before January 1, 1994, and for each commercial bakery oven installed on or after January 1, 1994. [Authority: Permit-to-Construct 510-0301-8-0278 issued 7/23/2015, COMAR 26.11.03.06C]
2.4	<u>Record Keeping Requirements:</u> A. & B. The Permittee shall maintain records of the types of fuels burned in each commercial bakery oven at the facility. [Authority: Permit-to-Construct 510-0301-8-0278 issued 7/23/2015] C. The Permittee shall maintain for at least five (5) years the following records: (1) total weight of goods produced and weighted average Yt values for each month and for all periods of twelve consecutive months for the facility's largest commercial bakery oven installed before January 1, 1994, and for each bakery oven installed on or after January 1, 1994; and (2) annual Yt values and total annual bakery production for each commercial bakery oven. [Authority: Permit-to-Construct 510-0301-8-0278 issued 7/23/2015, COMAR 26.11.03.06C and COMAR 26.11.19.21F(2)]
2.5	<u>Reporting Requirements:</u> A. & B. The Permittee shall report the types of fuels burned in each commercial bakery oven in the Permittee's annual certified emissions statements as required under condition 8 of <u>Section III – Plant Wide Conditions</u> of this Part 70 permit. C. If the Permittee determines that an affected commercial bakery oven satisfies any of the conditions in COMAR 26.11.19.21D(1), the Permittee shall notify the Department in writing within 10 business days of determination and comply with the requirements of COMAR

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Table IV – 2	
	26.11.19.21D(2) within one (1) calendar year after the year in which the conditions were satisfied. [Authority: COMAR 26.11.03.06C and COMAR 26.11.19.21F(3)]

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SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

- (1) No. 1 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The small (125 kW) emergency natural gas-fired generator installed 2003 is subject to the following requirements:

- (A) COMAR 26.11.09.05E(2), Emissions During Idle Mode:
The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (B) COMAR 26.11.09.05E(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (C) Exceptions:
 - (i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
 - (ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
 - (a) Engines that are idled continuously when not in service: 30 minutes
 - (b) all other engines: 15 minutes.
 - (iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.
- (D) 40 CFR 63, Subpart ZZZZ, which states that the Permittee must:

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- (i) Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - (ii) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
 - (iii) Inspect all hoses and belts every 500 hours of operation or annually whichever comes first, and replace as necessary;
 - (iv) Operate and maintain the engine and keep records as specified in Subpart ZZZZ; and
 - (v) Keep records of the hours of operation of the engine as recorded through a non-resettable hour meter.
- (2) ✓ Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (3) ✓ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;
- (4) No. 5 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The facility's five (5) small parts cleaners/degreasers are subject to COMAR 26.11.19.09D, which requires that the Permittee control emissions of volatile organic compounds (VOC) from cold degreasing operations by meeting the following requirements:

- (a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 ° C;
- (b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to

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operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses, and reducing the time and frequency during which parts are cleaned;

- (c) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

The Permittee shall maintain on site for at least five (5) years, and shall make available to the Department upon request, the following records of operating data:

- (a) Monthly records of the total VOC degreasing materials used; and
- (b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.

- (5) Containers, reservoirs, or tanks used exclusively for:

- (a) ✓ Storage of propane (3 storage areas for 30 lbs propane bottles);

- (b) No. varies Storage of lubricating oils (55-gallon drums);

- (c) No. varies The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

- (6) any other emissions unit, not listed in this section, with a potential to emit (exclude VOC pollutant) less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

- No. 6 Bulk flour silos, each equipped with fabric filters that exhaust inside the building. Five (5) of the silos have a storage capacity of 60,000 pounds, and the remaining silo has a storage capacity of 22,000 pounds.

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SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:
 - (a) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.
 - (b) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.
 - (c) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health
2. Operating Conditions: No additional requirements.
3. Testing and Monitoring: No additional requirements.
4. Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

- (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or
- (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

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BACKGROUND

H & S Bakery, Inc.
603 South Bond Street
Baltimore, MD 21231
Responsible Officer: Andrew J. Black, VP of Engineering, (410) 558-3050 x3339.

H & S Bakery, Inc. is located in Baltimore City and is a commercial bakery that produces several varieties of loaf breads and rolls. The facility operates four (4) baking lines, each of which uses a straight dough process. The primary SIC code for the facility is 2051.

The straight dough process does not require an initial fermentation period. All ingredients are mixed and immediately charged to a hopper that extrudes the dough in a continuous uniform stream. The dough passes through several machines to be shaped and cut down before being conveyed through a proof box where the dough rises. The dough is then transferred to an oven for baking, and the finished bread loafs and rolls and transported to a packaging plant via enclosed conveyors.

The Proof Box requires a high humidity environment to effectively process the dough. The facility's boilers produce process steam for the Proof Box. Only one boiler is operated at a time while the second boiler serves as a backup. All boilers and bakery ovens are fired with natural gas only. Based on annual actual production the facility's largest oven is currently oven number 5.

The Permittee also operates a machine shop that has two (2) small Safety-Kleen® degreasers that are not subject to Permit-to-Construct requirements.

The following table summarizes the actual emissions from H & S Bakery, Inc. based on its Annual Emission Certification Reports:

Table 1: Actual Emissions

Year	NO _x (TPY)	SO _x (TPY)	PM ₁₀ (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2023	3.81	0.024	0.072	3.20	71.37	0
2022	2.76	0.016	0.053	2.32	62.20	0
2021	3.94	0.024	0.074	3.31	68.13	0
2020	4.16	0.026	0.079	3.49	72.23	0
2019	3.70	0.021	0.071	3.10	78.68	0

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The major source threshold for triggering Title V permitting requirements in Baltimore City is 25 tons per year for VOC, 25 tons per year for NOx, 100 tons per year for each of the other criteria pollutants, 10 tons per year for a single HAP, and 25 tons per year for the combined total HAPS. Since the actual VOC emissions from the facility are greater than the major source threshold, H & S Bakery, Inc. is required to maintain and renew as required a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

On May 29, 2024, the Department received an application to renew the current Title V – Part 70 Operating Permit. An administrative completeness review was conducted, and the application was deemed to be administratively complete. An administrative completeness letter was sent on June 11, 2024.

Changes Since the Last Title V – Part 70 Operating Permit

The facility has not been modified since the issuance of the last Title V – Part 70 Operating Permit on June 1, 2020.

NSPS and MACT Applicability

NSR Applicability – None of the facility's installations is subject to NSR approval.

PSD Applicability – None of the facility's installations is subject to PSD approval.

NSPS Applicability – BLR-2 Cleaver Brooks steam boiler rated at 12.55 MMBtu/hr, burns only natural gas (ARA registration number 5-2148) was installed in 2013 and is subject to 40 CFR 60, Subpart Dc (NSPS for small steam generating units rated between 10 and 100 MMBtu/hr maximum heat input). The BLR-1 Cleaver Brooks boiler rated at 12.5 MMBtu/hr, burning natural gas only (ARA registration number 5-2213) was installed in 2016 and is also subject to 40 CFR 60, Subpart Dc.

NESHAP Part 61 Applicability – None of the facility's installations is subject to any NESHAP established under 40 CFR 61.

NESHAP Part 63 (MACT) Applicability – None of the facility's installations are subject to a MACT rule. The gas-fired boilers are not subject to Subpart JJJJJJ – National Emission Standards (NESHAP) for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. [Authority: 40 CFR §63.11195(e)]

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CAM PLAN

Compliance Assurance Monitoring (CAM) is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act for large emission units that rely on air pollution control (APC) equipment to achieve compliance. The CAM approach establishes monitoring for the purposes of: (1) documenting continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters, and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements; (2) indicating any excursions from these ranges; and (3) responding to the data so that the cause of the excursions are corrected. In order for a unit to be subject to CAM, the unit must be located at a major source, be subject to an emission limitation or standard; use a control device to achieve compliance; have pre-control emissions of at least 100% of the major source amount; and must not otherwise be exempt from CAM. Applicability determinations are made on a pollutant-by-pollutant basis for each emissions unit. The facility does not use any control devices to reduce emissions of VOC or HAPs; therefore, CAM requirements do not apply for this Title V permit renewal.

GREENHOUSE GAS (GHG) EMISSIONS

H & S Bakery, Inc. emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: nitrous oxide, methane, and carbon dioxide. These GHGs originate from various processes (i.e., combustion sources such as baking ovens and boilers) contained within the facility premises applicable to H & S Bakery, Inc. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements.

The emission certification reports for the years 2019, 2020, 2021, 2022, and 2023, showed that H & S Bakery, Inc. is not a major source (threshold: 100,000tpy CO₂e) for GHG's (see Table 2 shown below). While there may be no applicable requirements as a result of PSD, the Permittee shall quantify facility wide GHGs emissions and report them in accordance with Section 3 of the Part 70 permit.

The following table summarizes the actual emissions from H & S Bakery, Inc. based on its Annual Emission Certification Reports:

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Table 2: Greenhouse Gases Emissions Summary

GHG	Conversion factor	2019 tpy CO₂e	2020 tpy CO₂e	2021 tpy CO₂e	2022 tpy CO₂e	2023 tpy CO₂e
Carbon dioxide CO ₂	1	4,436	4,986	4,729	3,312	4,578
Methane CH ₄	25	0.085	0.096	0.090	0.064	0.088
Nitrous Oxide N ₂ O	298	0.082	0.092	0.086	0.061	0.084
Total GHG CO₂eq		4,436	4,986	4,729	3,312	4,578

EMISSION UNIT IDENTIFICATION

H & S Bakery, Inc. has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements.

Table 3: Emission Unit Identification

Emissions Unit Number	ARA Registration Number	Emissions Unit Name and Description	Date of Installation
BLR-1	5-2213	Cleaver Brooks boiler, rated at 12.5 MMBtu/hr, fired by natural gas only	2016 (replaced original no. 1 boiler installed before 1976)
BLR-2	5-2148	Cleaver Brooks Steam (CBR-700-300-1-1) boiler rated at 12.55 MMBtu/hr, fired by natural gas only	2013 (replaced original no. 2 boiler installed before 1989)
BO-1	8-0278	Baking Oven No. 1, Turkington 970-48, rated at 6.0 MMBtu/hr, fired by natural gas only	2008 (replaced original no. 1 oven installed in 1950)
BO-2		Baking Oven No. 2, Werner & Pfleiderer Ecotherm tunnel oven for rolls, rated at 2.5 MMBtu/hr, fired by natural gas only	2003 (replaced original no. 2 oven installed in 1950)
BO-3		Baking Oven No. 3, Baker Thermal Solutions model 960 tunnel oven for buns and rolls, rated at 3.0 MMBtu/hr, fired by natural gas only	2015 (replaced original no. 3 oven installed in 1950)

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BO-5		Baking Oven No. 5, APV Baker model 970-68 tray oven for bread production, rated at 8.5 MMBtu/hr, fired by natural gas only	2004 (replaced original no. 5 oven installed in 1950)
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AN OVERVIEW OF THE PART 70 PERMIT

The Fact Sheet is an informational document. If there are any discrepancies between the Fact Sheet and the Part 70 permit, the Part 70 permit is the enforceable document.

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record keeping, and reporting requirements. The demonstration may include one or more of these methods.

Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

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Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE
METHODOLOGY

Permitting History:

Dates of Initial Construction/Registration, Modifications and Reconstructions:

- The dates of initial construction/registration for each registered active installation or process are shown in Table 3 above. There have been no significant reconstructions or modifications to any of the active emissions units since their respective initial installation dates.
- Permit-to-Construct number 510-8-0278M issued October 17, 2003 authorized replacement of the Permittee's number 2 baking oven with a new oven rated at 2.5 MMBtu/hr maximum heat input.
- Permit-to-Construct number 510-8-0278M issued November 5, 2004 authorized replacement of the Permittee's number 5 baking oven with a new oven rated at 8.5 MMBtu/hr maximum heat input. The new oven became the facility's largest oven with regard to actual production.
- On March 25, 2008, a Permit to Construct (Permit No. 510-0301-8-0278) was issued for the installation of one 6 MMBtu/hr natural gas fired bakery oven to replace the existing number 1 bakery oven.
- On February 5, 2013, a general Permit to Construct was issued for the installation of one (1) Cleaver Brooks Natural-Gas Fired Steam (CBR-700-300-1-1) boiler rated at 12.55 MMBtu/hr to replace original no. 2 boiler (rated at 18 MMBtu/hr installed before 1989).
- On July 23, 2015, a Permit to Construct (Permit No. 510-0301-8-0278) was issued for the installation of one (1) 3 MMBtu/hr natural gas-fired bakery oven to replace the existing number 3 bakery oven.
- On April 5, 2016, a general Permit to Construct was issued for the installation of one (1) Cleaver Brooks natural gas-fired boiler rated at 12.5 MMBtu/hr to replace the original BLR-1 rated at 12.75 MMBtu/hr installed before 1976.

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Applicable Standards and Limits:

1. Table IV-1 – Emissions Units BLR-1 and BLR-2:

BLR-1: One (1) Cleaver Brooks boiler rated at 12.5 MMBtu/hr maximum heat input, burns natural gas only (ARA Registration No. 510-0301-5-2213)

BLR-2: One (1) Cleaver Brooks steam boiler rated at 12.55 MMBtu/hr, burns natural gas only (ARA Registration No. 510-0301-5-2148)

The boilers are used to produce process steam for the facility's Proof Box, which requires a high humidity environment in order to effectively process dough. Only one (1) boiler is operated at a time while the second boiler serves as backup. The boilers are subject to the New Source Performance Standards (NSPS) of 40 CFR 60, Subpart Dc.

- A. COMAR 26.11.09.05A(2), which prohibits the discharge of visible emissions, other than water in an uncombined form, from any fuel-burning equipment located in Area III except as provided under COMAR 26.11.09.05A(3).

Exceptions. **COMAR 26.11.09.05A(3)** establishes that Section A(2) does not apply "to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

Mechanism For Demonstrating Compliance:

The Permittee is required to report occurrences of visible emissions from the boiler in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report"), of Section III – Plant Wide Conditions.

Rationale For Compliance Mechanism:

Small boilers that burn natural gas will generally have no visible emissions. Such boilers are designed to operate automatically, without oversight of an operator, and require minimal preventive maintenance to maintain a level of combustion performance that does not cause visible emissions. Although the permit imposes no specific schedule for conducting observations of stack emissions, the

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Permittee is required under the general reporting requirement for excess emissions and deviations to report occurrences of any visible emissions that are observed.

- B. Operational Limitation: The Permittee shall burn only natural gas in the boilers unless the Permittee obtains from the Department written authorization to burn alternative fuels. [Authority: COMAR 26.11.02.09A]

Mechanism For Demonstrating Compliance:

The Permittee is required to maintain records of the types and amounts of fuel burned to support the annual emissions certification report (permit condition 8 of Section III, Plant Wide Conditions "Emissions Certification Report"). The annual certification report must contain the types, quantities, and analyses of all fuels burned. No additional requirements are needed to show compliance with this operational limitation.

The Permittee shall keep for at least five (5) years a monthly record of fuel combusted or the amounts of each type of fuel delivered to the property each month. [Authority: COMAR 40 CFR §60.48c(g)(2) or (3)]

Rationale:

The required recordkeeping is sufficient for compliance with this requirement.

2. Table IV-2 – Emissions Units BO-1, BO-1, BO-3, BO-5, Four (4) Commercial Bakery Ovens Fired By Natural Gas and that Produce Loaf Breads and Rolls (ARA Registration No. 510-0301-8-0278):

BO-1: Baking Oven No. 1, Turkington 970-48, 6.0 MMBtu/hr maximum heat input, installed in 2008

BO-2: Baking Oven No. 2, Werner & Pfleiderer Ecotherm tunnel oven for rolls, 2.5 MMBtu/hr maximum heat input, installed in 2003

BO-3: Baking Oven No. 3, Baker Thermal Solutions model 960 tunnel oven for buns and rolls, 3.0 MMBtu/hr maximum heat input, installed in 2015

BO-5: Baking Oven No. 5, APV Baker model 970-68 tray oven for bread production, 8.5 MMBtu/hr maximum heat input, installed in 2004

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The facility uses four (4) natural gas-fired bakery ovens in order to produce various loaf breads and rolls. The ovens are not subject to any NSPS or NESHAP requirements but are subject to State regulations in order to control emissions of VOC from the facility.

A. Visible Emissions Limitations:

- A1. COMAR 26.11.06.02C(2)**, which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in uncombined form, which is visible to human observers.

Exceptions: **COMAR 26.11.06.02A(2)** establishes that "the visible emissions standards in COMAR 26.11.06.02C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Mechanism For Demonstrating Compliance:

The Part 70 permit does not impose a specific schedule for conducting observations of stack emissions, however the Permittee is required under the general reporting requirement for excess emissions and deviations to report occurrences of any visible emissions that are observed. Therefore, the compliance demonstration is to meet the recordkeeping and reporting requirements.

Rationale For Not Requiring Periodic Observations:

The Part 70 permit requires that the ovens burn only natural gas (see A2 immediately below), which gives little potential for visible emissions. Particulate emissions are virtually zero, and emissions of ethanol (which is the primary pollutant from the baking process) are not visible.

- A2. Operational Requirement:** The Permittee shall burn only natural gas in each of the ovens unless the Permittee obtains from the Department written authorization to burn alternative fuels. [Authority: Permit-to-Construct 510-8-0278 issued 7/23/2015]

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Mechanism for Demonstrating Compliance:

The Permittee is required to maintain records of the types and quantity of fuel burned to support the annual emissions certification report (permit condition 8 of Section III, Plant Wide Conditions "Emissions Certification Report"). The annual certification report must contain the type, quantities, and analyses of all fuels burned. No additional requirements are needed to show compliance with this operational limitation.

Rationale:

The recordkeeping and reporting requirements are sufficient for compliance demonstration.

B. Control of Particulate:

COMAR 26.11.06.03B(2)(a), which limits the concentration of particulate matter in process exhaust gases to not more than 0.03 grains per standard cubic foot of dry exhaust gas.

Mechanism For Demonstrating Compliance:

The Permittee is required to burn only natural gas in the baking ovens (see Operational Requirement A2 above), and this is sufficient to ensure that particulate emissions will be minimal.

Rationale:

The operational requirement is sufficient for compliance demonstration.

C. Control of VOC:

- C1. COMAR 26.11.19.21**, which establishes requirements for control of VOC from commercial bakery ovens.

Note: COMAR 26.11.19.21C(2), states that only the largest oven at the facility is subject to the provisions of COMAR 26.11.19.21D (with an exemption for ovens constructed before 1942), while COMAR 26.11.19.21C(5) states that a person who owns or operates a bakery oven constructed on or after January 1, 1994, that satisfies the conditions in COMAR 26.11.19.21D(1) shall comply with COMAR 26.11.19.21D(2). All of the ovens at the facility were installed after

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January 1, 1994, and therefore must meet the requirements in D(2) if the conditions in D(1) are satisfied.

- C2. In accordance with **COMAR 26.11.19.21C(5)**, for any commercial bakery oven constructed on or after January 1, 1994, that satisfies the conditions in COMAR 26.11.19.21D(1) the Permittee shall comply with COMAR 26.11.19.21D(2).

Note: To date the Permittee's production has been such that none of the ovens are subject to D(2). The 2023 production and Yt values are as follows:

Bakery Oven	Tonnage	Yt Value
BO-1	18,972	6.0
BO-2	1,757	5.3
BO-3	8,486	4.8
BO-5	16,060	7.2

- C3. In accordance with **COMAR 26.11.19.21 & D(1)**, if any of the facility's bakery ovens (see note above) exceeds the average annual production tonnage of finished bread, rolls, or other yeast-raised products for the corresponding Yt value listed below, then thereafter the bakery oven shall be subject to COMAR 26.11.19.21D(2).

- (1) 10,000 tons with a Yt value of greater than 11.0;
- (2) 15,000 tons with a Yt value between 8.1 and 11.0;
- (3) 22,500 tons with a Yt value between 5 and 8.0;
- (4) 28,000 tons with a Yt value less than 5.

- C4. In accordance with **COMAR 26.11.19.21D(2)**, if an affected commercial bakery oven satisfies any of the conditions in COMAR 26.11.19.21D(1), the Permittee shall not cause or permit the discharge of VOC into the atmosphere unless emissions from the affected oven are exhausted directly into a control device which is installed, operated, and maintained to reduce VOC emissions from the bakery oven by 80 percent or more overall. In accordance with **COMAR 26.11.19.21F(3)**, if an affected commercial bakery oven satisfies any of the conditions in COMAR 26.11.19.21D(1) the Permittee shall comply with the requirements of COMAR 26.11.19.21D(2) within 1 calendar year after the year in which the conditions were satisfied.

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Mechanism For Demonstrating Compliance:

The Permittee is required to determine and maintain records of the production of yeast raised products and weighted average Yt values for each oven for each month of operation and for all periods of twelve consecutive months. [Authority: Permit-to-Construct 510-0301-8-0278 issued 7/23/2015, COMAR 26.11.03.06C and COMAR 26.11.19.21F(2)]

The Permittee is required to maintain records of annual Yt values and total annual bakery production for each commercial bakery oven. [Authority: Permit-to-Construct 510-0301-8-0278 issued 7/23/2015, COMAR 26.11.03.06C and COMAR 26.11.19.21F(2)]

Currently the Permittee is not required to install add-on controls. If an affected oven's production tonnage exceeds the amount associated with the pertinent Yt value provided under COMAR 26.11.19.21D(1) then the Permittee is required to notify the Department within 10 business days and install the required control device in accordance with the schedule provided under COMAR 26.11.19.21F(3). [Authority: COMAR 26.11.03.06C]

Rationale:

The recordkeeping and reporting requirements are sufficient for compliance demonstration.

COMPLIANCE SCHEDULE

H & S Bakery, Inc. is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

Not Applicable.

TITLE VI – OZONE DEPLETING SUBSTANCES

H & S Bakery, Inc. is not subject to Title VI requirements.

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SECTION 112(r) – ACCIDENTAL RELEASE

H & S Bakery, Inc. is not subject to the requirements of Section 112(r).

PERMIT SHIELD

H & S Bakery, Inc. did not request a permit shield.

INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

- (1) No. 1 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The small (125 kW) emergency natural gas-fired generator installed 2003 is subject to the following requirements:

- (a) COMAR 26.11.09.05E(2), Emissions During Idle Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (b) COMAR 26.11.09.05E(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (c) Exceptions:
 - (i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
 - (ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:

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- (a) Engines that are idled continuously when not in service: 30 minutes
- (b) all other engines: 15 minutes.
- (iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.
- (d) 40 CFR 63, Subpart ZZZZ, which states that the Permittee must:
 - (i) Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - (ii) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
 - (iii) Inspect all hoses and belts every 500 hours of operation or annually whichever comes first, and replace as necessary;
 - (iv) Operate and maintain the engine and keep records as specified in Subpart ZZZZ; and
 - (v) Keep records of the hours of operation of the engine as recorded through a non-resettable hour meter.
- (2) ☒ Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (3) ☒ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;
- (4) No. 5 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The facility's five (5) small parts cleaners/degreasers are subject to COMAR 26.11.19.09D, which requires that the Permittee control emissions of volatile organic compounds (VOC) from

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cold degreasing operations by meeting the following requirements:

- (a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 ° C;
- (b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses, and reducing the time and frequency during which parts are cleaned;
- (c) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

The Permittee shall maintain on site for at least five (5) years, and shall make available to the Department upon request, the following records of operating data:

- (a) Monthly records of the total VOC degreasing materials used; and
 - (b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.
- (5) Containers, reservoirs, or tanks used exclusively for:
- (a) ✓ Storage of propane (3 storage areas for 30 lbs propane bottles);
 - (b) No. varies Storage of lubricating oils (55-gallon drums);
 - (c) No. varies The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

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- (6) any other emissions unit, not listed in this section, with a potential to emit (exclude VOC pollutant) less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

No. 6 Bulk flour silos, each equipped with fabric filters that exhaust inside the building. Five (5) of the silos have a storage capacity of 60,000 pounds, and the remaining silo has a storage capacity of 22,000 pounds.

STATE ONLY ENFORCEABLE REQUIREMENTS

This section of the permit contain state-only enforceable requirements. The requirements in this section will not be enforced by the U.S. Environmental Protection Agency. The requirements in this section are not subject to COMAR 26.11.03 10 - Public Petitions for Review to EPA Regarding Part 70 Permits.

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:
 - (a) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.
 - (b) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.
 - (c) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health
2. Operating Conditions: No additional requirements.
3. Testing and Monitoring: No additional requirements.
4. Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

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- (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or
- (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.